the Commission to conclude that the ILEC's pre-order interfaces (such as they are) are operationally ready. To the best of MCI's knowledge, to this date, no carrier has actually used Ameritech's EDI interface for pre-ordering unbundled elements. This is not surprising, for Ameritech did not make its EDI available for pre-order functions until December, 1996. Consequently, Ameritech must rely on its own internal testing, and that of a software vendor aligned with Ameritech. At present, therefore, there can be no assurance that these interfaces will work satisfactorily in an actual competitive environment. Indeed, this conclusion seems required by Mr. Rogers' own acknowledgment earlier this year that OSS systems cannot be deemed operationally ready prior to full integration testing.[4]

Ordering

Q: Moving on, what is your assessment of Ameritech's Ordering interfaces for Unbundled Network Elements?

A: Ameritech uses different OSS interfaces for the ordering of different unbundled elements. It proposes to use EDI for unbundled local switching and Access Service Request ("ASR") for other unbundled elements. There are several problems with these proposed interfaces.

First, I should make clear that MCI fully supports Ameritech's planned use of

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[4] See Oral Testimony of Joseph A. Rogers, before Ill. Comm. Comm'n, Docket No. 96-0404 (Jan. 16, 1997), hearing transcript at 1101, 1108-09.

EDI OSS Gateway technology for unbundled local switching. EDI is the approved industry solution in this context and should be used by all ILECs. But the mere fact that Ameritech is using EDI for ordering unbundled switching does not answer the question whether that process conforms to industry standards. While many carriers are using EDI Version 6.0, and the OBF Local Service Ordering Guideline solution requires version 7.0 to comply fully with OBF standards, Ameritech continues to use Version 5.0. There are numerous pieces of critical functionality that Ameritech's older version of this interface does not supply. Moreover, by persisting in using an outdated interface, as other ILECs implement the updated version, Ameritech burdens requesting carriers, at least those operating on a national basis, with the need to maintain simultaneous proficiency, at both software and personnel levels, in (at least) two different EDI specifications.

Even more importantly, Ameritech's claims that its EDI interface for the ordering of unbundled switching is fully operational is wholly unsupported. Ameritech acknowledges that, as of today, it has never provided unbundled switching to any CLEC. Whatever the reasons for this fact (an issue beyond the scope of this affidavit), the result is that it is impossible to conclude that Ameritech's EDI interface and downstream business processes will work in a satisfactory manner. It necessarily takes time for carriers to develop internal support systems and coordinate with each other. The critical bottom-line, from an OSS standpoint, is that, Ameritech must have real experience handling orders for unbundled switching before anyone can say that its systems work the way they should.

Q: You have shared your views on Ameritech's systems for ordering unbundled switching. Does the same criticism apply to ordering unbundled loops and other elements?

A: While Ameritech's EDI interface for ordering unbundled switching cannot be deemed "operationally ready," it is, at least, the correct standard to employ. The same cannot be said for Ameritech's proposed use of the ASR process to order other unbundled network elements such as local loops. ASR is an interface designed to enable IXCs (and CAPs) to order access arrangements from the LECs. As an interface for ordering unbundled loops, ASR is not in accordance with industry guidelines, which specify EDI formats. As such, Ameritech's decision to deploy ASR for this function is inconsistent with its own previous acknowledgment that "[t]he ability to do business between multiple local exchange carriers and incumbent LECs dictates that . . . electronic interfaces adhere to national or industry-based standards where available."[5]

It is certainly not the case that it is appropriate to use for a particular function a standard interface developed and approved for a different function. For one thing, Ameritech imposes an approximately $50 tariffed charge for every ASR it processes. This so-called "Administrative Fee" is exorbitant and serves as a transactional penalty. Far more importantly, Ameritech's decision to use different interfaces for different pieces of what should be single transactions greatly exacerbates the burdens faced by the CLEC. In particular, separating the ordering process for loops and

[5] Ameritech July 10 Ex Parte, at 5, quoted in Local Competition Order ¶ 513.

unbundled local switching between two separate and distinct ordering systems will require duplicate work to combine a single loop and a single switch port just to provide basic phone service. Furthermore, at present CLECs must submit orders for service disconnect and for interim local number portability ("ILNP") -- both of which are usually required in any order for unbundled loops -- by fax. This fragmentation of ordering processes is as unnecessary as it is onerous. The OBF has defined the requirements for a mechanized LSR to be used with the EDI interface that accommodates (among other things) the ability to order unbundled loops, switches, service disconnect and ILNP together. This is the industry standard solution Ameritech should use.

Q: Has MCI tested Ameritech's ability to process requests for unbundled loops?

A: Although MCI has run 15 unbundled loop trials with Ameritech, we have not used its ASR interface for reasons that underscore why Ameritech's proposed solution is wholly inadequate. MCI is gearing up to offer local service in many states at once, and as I have explained, it is simply too expensive and burdensome for MCI to develop the capability to use nonstandard interfaces in all of these states. This is especially true because the fragmentation of Ameritech's ordering process ensures that MCI would realize little benefit were we to make the efforts necessary to use Ameritech's ASR. Because we would still have to fax orders for disconnect and ILNP, it is almost irrelevant whether we fax the order for the unbundled loop itself or send that order via a (nonstandard) automated interface. MCI, like any CLEC,

requires an automated solution that accommodates all discrete pieces that are involved in the provision of service via unbundled elements because that whole transaction is only as efficient as the efficiency of its weakest part. It should be understood that the weakest link in Ameritech's loop ordering process is significantly so.

Provisioning

Q: **What is your assessment of Ameritech's provisioning interfaces for UNEs?**

A: Provisioning involves the exchange of information between carriers in which one executes a request for a set of products or services from the other with attendant acknowledgments and status reports. There are three provisioning sub-functions, i.e., three types of reports the provisioning ILEC must communicate to the requesting CLEC: firm order confirmation, change in order status, and order completion. Ameritech uses the ASR interface for firm order confirmation but does not employ -- and apparently does not even intend to employ -- any form of automated interface for the other two sub-functions. This is totally unsatisfactory.

First, the appropriate and standardized interface for firm order confirmation is, again, EDI and not ASR. The use of a non-standard ASR system would impose substantial and unnecessary costs upon CLECs for additional software and training unique to the Ameritech region.

In other proceedings, Ameritech has generally asserted that there is no need

for a mechanized interface for order status and order completion when provisioning UNEs because most unbundled loop orders are coordinated with the requesting carrier. This argument is nothing less than absurd. Customers demand prompt and accurate information regarding the timely provision of telecommunications services. Consequently, CLECs like MCI require a mechanized interface for both resold and unbundled services in order to provide timely and up-to-date information regarding the status, potential delay, and final completion of the provision of these services. Relying on the Ameritech to provide the necessary information manually is not acceptable. Indeed, the fact that Ameritech does offer an EDI interface for these subfunctions in the resale context only underscores the inappropriateness of their refusal to do the same for ordering of unbundled elements.

Repair & Maintenance

Q: **Does Ameritech provide an adequate interface for Repair and Maintenance of UNEs?**

A: Ameritech proposes to use an electronic bonding ("EB") solution developed by the T1M1 committee for repair and maintenance functions. Ameritech correctly states that this is the current industry standard specification. Although it will be essential for ILECs to upgrade to a specification (now in development at the ECIC) that allows for true bi-directional, "agent-to-agent" communication when such interface becomes available, MCI fully supports the interface Ameritech purports to have

deployed for the present.

Ameritech has claimed elsewhere that there is no question that the repair and maintenance interface is operational. Ameritech seemingly acknowledges that no CLEC is currently using the T1M1-approved EB solution -- or any automated interface, for that matter -- for communicating maintenance and repair information for local service. Accordingly, Ameritech bases its view that its EB interface is sufficiently tested entirely on the fact that it has used that interface successfully for purposes of exchanging repair and maintenance information related to access services with AT&T and MCI. In my opinion, Ameritech reads its experience with the T1M1-approved interface for far more than it is worth.

The maintenance and repair processes involved in the access arena are, in many respects, quite different from those that will be necessary when competing carriers are using unbundled elements to provide local service. In the latter scenario, but not in the former, Ameritech must, among other things, be able to request authorization to perform deregulated work activities at the CLEC customer's site, and to receive communication of trouble history information from the CLEC.

In addition to this general difference between access and local services regarding the types of communication that must be exchanged, specific problems are presented by the fact that Ameritech, like several other BOCs, uses two trouble handling systems: Work Force Administration (WFA) and Loop Maintenance Operating System (LMOS). When another carrier sends a trouble ticket to Ameritech (via the EB interface), that ticket will be routed to either WFA or LMOS

depending entirely on the category of service against which the trouble is written: access services are routed to WFA for resolution, and local services are routed to LMOS. The LMOS system is severely limited in its ability to support cases of trouble sent over Ameritech's OSS interface. These limitations are due to the fact that LMOS has far fewer dedicated fields than WFA for the presentation of information to the Ameritech technician. Consequently, much of the information that an MCI technician enters in an access service ticket destined for Ameritech's WFA system today will be invisible to the Ameritech technician looking at a local service trouble report presented in Ameritech's LMOS system tomorrow. The MCI technician has no view into the LMOS limitations, and thus has no way of knowing what data will be presented to an LMOS user, and what will be lost. However, an Ameritech technician inputting a trouble report does not suffer from the same handicap. Because the Ameritech technician's access to LMOS is not mediated by an OSS gateway, he or she has visibility into the data presentation limitations of LMOS, and therefore will enter no more information than can be presented to a user at a later time. Thus, the level of service LMOS provides to Ameritech's local service customers will be greater than it could provide to MCI's local service customers.

For these reasons, the extent to which Ameritech's relative success with the T1M1 interface in exchanging trouble reports for access service is translatable to the local exchange markets remains, at best, entirely uncertain. Whether the operational processes necessary to support maintenance and repair in the context of unbundled

network elements used to provide local exchange service will prove satisfactorily coordinated with the EB interface Ameritech uses is a factual question that, at this point, remains unanswered.

Billing

Q: What is your assessment of Ameritech's billing interfaces for unbundled network elements?

A: The billing function encompasses two discrete sub-functions: daily usage reports that provide the information required to enable CLECs to bill their end users, and monthly bills detailing what the CLEC owes the ILEC. It has never been clear to me whether and, if so, how Ameritech purports to transmit daily usage information for use of unbundled switching. This gap makes it impossible to conclude that Ameritech's OSS interfaces for billing are competitively adequate.

Moreover, the accuracy, timeliness and accessability of usage feeds are matters of tremendous importance. It is common knowledge that problems which plagued Sprint's billing systems in the late 1980s -- resulting in long-delayed and inaccurate subscriber bills -- cost that carrier tens of millions of dollars in lost revenue and incalculable consumer goodwill.[6] A CLEC that is unable to bill its end-users accurately because of problems with the usage feeds it receives from the

[6] See, for example, Calvin Sims, Errors Continue to Plague U S Sprint's Billing System, NY Times, at D1 (Mar. 3, 1988).

ILEC will suffer similar marketplace consequences. Furthermore, these are problems that often are not easily resolved. It took Sprint -- which obviously had every incentive to move fast -- years to correct their systems. If Ameritech (or any BOC) receives interLATA authorization before its billing systems are proven to work properly, it will not have comparable incentives to correct expeditiously any errors that might subsequently arise. In short, because problems with a BOC's usage feeds can prove disastrous to CLECs, and because it will be very difficult for regulators to determine whether a BOC is truly doing all it can to resolve any errors that might arise,[7] it is critical that all billing systems be proven to work in actual competitive use and at meaningful capacity before Ameritech is found to have satisfied the requirements of section 271.

Ameritech uses the Carrier Access Billing System ("CABS") for actual billing. MCI supports use of CABS in the unbundled network element context at the present time. Again, however, the extent to which the interfaces are translatable to the new context for which Ameritech proposes to use them depends on the downstream business processes. Ameritech has stated elsewhere that it has used CABS for billing carriers for unbundled loops since April 1995. However, to my knowledge, Ameritech has not provided any information to assist in assessing how well the system has performed. Moreover, even if Ameritech's version of CABS

[7] See Mike Wills, Sorry, Wrong Number: New Wireless Phone Firms Plagued by Billing Problems, Wash. Post, at D1 (Sept. 6, 1996) (noting "that getting the services to market is only half the battle: Getting the numbers right on the monthly bill is more complex and glitch-prone than many companies expect").

has worked satisfactorily for billing unbundled loops, whether Ameritech can provide timely and accurate bills for the use of other unbundled elements is entirely unknown.

IV. RESALE

Pre-Ordering

Q: How would you characterize the adequacy of Ameritech's pre-ordering interfaces in the resale context?

A: Ameritech uses the same interfaces for the pre-order function on resale transactions as it does on unbundling requests: EDI and File Transfer. I have already explained why these solutions are not consistent with the long-term development of true local exchange competition in the context of unbundled network elements. Those same criticisms also apply in the resale context. To repeat: it is essential from a competitive standpoint that, at the pre-ordering stage at the very least, new entrants have the same true, real-time interactive access to the relevant databases as does the BOC. Ameritech should make an enforceable contractual commitment to provide an electronic bonding interface for all pre-ordering sub-functions as soon as one is determined by the relevant industry forums.

Even if EDI and FTP were satisfactory interim solutions -- and I emphasize that Ameritech has given no indication that it considers these solutions "interim" at

all -- Ameritech fails to provide any evidence that they are in fact operationally ready. To MCI's knowledge, no carrier is presently using EDI for exchanging pre-ordering information.

Ordering

Q: **What is MCI's experience with Ameritech's resale ordering interface?**

A: Perhaps the most glaring OSS failure related to Ameritech's resale offerings involves the great number of electronic transactions which require manual intervention. Ameritech has conceded elsewhere that manual interfaces cannot provide access at parity with electronic interfaces. Yet Ameritech generally acknowledges that manual intervention is required for, among other things, orders involving Centrex service, private lines and listing changes, and for such routine tasks as due date assignment for many other orders. Other routine transactions also require manual processing. Indeed, no enhanced and data services -- e.g. Integrated Services Digital Network (ISDN) Basic Rate Interface (BRI) and Primary Rate Interface (PRI), Centrex Services, Frame Relay, SMDS, ATM or DID/PBX trunks -- can be ordered from Ameritech via a fully automated interface.

Q: **Why is manual intervention a problem, assuming Ameritech can provide sufficient human capacity to meet forecasted demand for resale services.**

A: Even with sufficient ILEC employees, manual intervention in the ordering process is

extremely problematic because it poses substantial risks of delay and error, as MCI's recent experience reselling PacBell's service in California graphically bears out. As is detailed in a complaint MCI filed with the California Public Utilities Commission,[8] PacBell's use of a manual order processing system has caused many customers who had selected MCI as their local service provider to experience involuntary loss of dial tone or to be migrated to other carriers instead of MCI. Additionally, PacBell's use of a manual process for the transmission of FOCs has resulted in so much delay that, as of the date of MCI's complaint, FOCs remained outstanding on literally thousands of resale orders, some of which had been submitted nearly three months earlier. It is difficult to believe that Ameritech would have better success than PacBell using a similar system.

Despite the obvious and enormous problems that manual processing entails, Ameritech generally asserts that these types of electronic orders necessarily require manual intervention. Any such suggestion by Ameritech is wrong. There is nothing inherent in the nature of these transactions that makes manual intervention necessary. It is technologically feasible to design and implement interfaces and downstream systems that obviate the need for the manual interventions that presently occur. What makes such manual intervention "necessary," therefore, is simply the present inadequacy of Ameritech's OSS systems for resale -- a truth confirmed by Ameritech's own recognition elsewhere that it is working to eliminate the need for

[8] MCI Telecommunications Corp. vs. Pacific Bell and Pacific Bell Communications, Complaint, at 6-19 (filed before the Pub. Util. Comm'n of California, Dec. 11, 1996).

manual intervention.[9]

Furthermore, although Ameritech is correct to deploy an EDI interface for ordering POTS resale, substantial doubts remain about its operational readiness for reasons I will explore when discussing MCI's experience with the new version Ameritech recently unveiled.

Q: You testified earlier that the downstream business processes can be every bit as critical as the development of the actual interface. What is MCI's experience with Ameritech's ability to actually provide resold services as ordered through the OSS system?

A: Whatever might be said about Ameritech's OSS EDI interface for resale ordering, Ameritech's claim that the downstream systems supported by its ordering interfaces are "operationally ready" is preposterous. In MCI's experience, Ameritech's performance with regard to the crucial issue of coordination with respect to requesting carriers' use of Ameritech's OSS interfaces has been woeful. We have had an extraordinarily difficult time getting the most basic information from Ameritech without which we could not even begin to run resale trials. Time and again, Ameritech furnished incorrect information or took several weeks to provide any information at all.

One critical area in which MCI has had particular and recurring difficulty

[9] See "Ameritech Unveils 'OSS,' But Illinois Raises Questions," Comm. Daily's Washington Telecom Newswire (Jan. 9, 1997).

involves our efforts to obtain the proper USOC codes for use with Ameritech's EDI interface. USOC codes are specific alphabetic or alpha-numeric sequences that identify particular services. The codes are not industry standard; each ILEC can devise and assign its own. When inputting information to Ameritech through EDI -- in an order, say, for resale or repair -- a CLEC must employ the correct USOC code for each service or function it wants to identify or the transaction will "error out." It is essential, therefore, that the CLEC have at all times correct and updated USOC codes. MCI has been unable to get correct information from Ameritech in a timely manner.

It is true that Ameritech provides CLECs with some resources in this regard. It has furnished MCI a printed USOC guide and it enables MCI to download tables off the internet. But these solutions are inadequate. The printed guide, for example, is organized only by USOC code, not by service or facility. And the service descriptions provided, whether in the guide or on line, are often intolerably cryptic or ambiguous -- for example, two or more codes often correlate with the exact same verbal description of a service or facility. Worse, Ameritech's tariffs generally fail to identify corresponding USOC codes. Consequently, MCI has been compelled on many occasions to fax or e-mail particular USOC questions to designated Ameritech representatives. Ameritech's processing and response to these questions has been poor. For example, on November 13 and 18, MCI asked Ameritech for the USOC codes needed to place specific orders for the resale of trunks. MCI did not receive even a preliminary response to our questions until December 9. We received an

allegedly comprehensive response on December 13 -- one full month after we submitted our questions -- and that response was still incomplete.

That MCI often cannot identify particular USOC codes it needs for submission of orders to Ameritech's systems without making specific individual manual queries of Ameritech is utterly anti-competitive. There are literally thousands of services and functions that support USOC codes, and each ILEC can, and often does, assign codes to services in its own idiosyncratic fashion. To make matters worse, Ameritech does not use a single set of USOC codes for all of its states. The Ameritech-defined USOC code for basic line-backer, for example, is "MNTXP" in Michigan, for example, but MNTPB in Illinois. For these reasons, Ameritech, like all BOCs, should be expected to implement the OBF- and TCIF-approved industry standard EDI Feature Code Listing. At the very least, it is critical that Ameritech provide CLECs with the same electronic database of USOC codes, and the same USOC training, that it provides its own representatives.

Needless to say, CLECs' lack of satisfactory access to Ameritech's internal USOC database causes significant harms because it creates a substantial risk that CLECs will input incorrect or out-of-date USOC codes. When that happens, the order will either be incorrectly processed or errored-out. Either way, the BOC is likely to claim that the CLEC made the mistake. In fact, when explaining why 90 out of 157 trial orders placed by AT&T were not processed, Ameritech did precisely

this, characterizing all entry of "invalid" USOC codes as AT&T errors.[10] In reality, however, this mis-communication was very likely due to Ameritech's failure adequately to train and support the CLEC in this regard. As I explained earlier, the BOCs have a responsibility to ensure that connecting carriers have sufficient information of Ameritech's OSS, including working with carriers that experience rejected orders and/or orders that require manual intervention. Unfortunately, because end-user customers are certain to hold the CLEC responsible for all mishaps, rather than Ameritech, the ILEC has little incentive to supply the necessary support.

Q: Hasn't Ameritech offered to train MCI on the use of its OSS systems?

A: Ameritech has claimed elsewhere that it routinely sends experienced personnel to requesting carriers' premises to explain its OSS. Such claims are contrary to MCI's experience. Seeking to avail ourselves of this necessary training, MCI scheduled an appointment for Ameritech's EDI expert, Tim Gilles, to conduct a "walk-through" at MCImetro's Vienna, VA facility on October 31, 1996. An Ameritech account manager then contacted me as MCI's representative, Ms. Miller, to cancel the visit on less than 24 hours notice while I ~~Ms. Miller~~ was mid-flight to Virginia from her office in Denver. Mr. Gilles said he would not be able to make time available to MCI until November 22 and that, because of limited time availability, he could not travel to

[10] Supplemental Rebuttal Testimony of Joseph A. Rogers, submitted as Ameritech Illinois Ex. 9.0, before the Ill. Comm. Comm'n, Docket No. 96-0404, at 21.

MCI's facilities. ~~Ms. Miller~~ I was therefore required to travel to Ameritech's facilities in Chicago for the presentation at which time Mr. Gilles walked MCI's Virginia-based technicians through Ameritech's EDI interfaces by conference call.

Provisioning

Q: **What is your view on Ameritech's OSS systems for provisioning resold service following transmission on an order?**

A: Ameritech purports to use EDI to communicate firm order commitments, order status, and order completion. In theory, that is the correct, standardized interface. However, it cannot be credibly maintained that Ameritech's EDI interface is operationally ready. On the first of this year, Ameritech upgraded the specifications for its EDI interface, converting to Version 3.0 of its Electronic Service Ordering Guidelines. These new specifications added critical functionality that had been lacking in its prior version, which, for example, did not contain a jeopardy notification process and could not accommodate most directory listings without manual intervention. Ameritech had assured MCI that no basic functionality that had existed under its previous specifications had been altered and that Version 3.0 was completely backward compatible. Shortly after the new version was introduced, MCI sent Ameritech a simple trial resale order for test purposes. The FOC Ameritech returned contained material misinformation -- a consequence of what Ameritech subsequently admitted was a "system bug."

Additionally, MCI discovered that when the FOC identifies that an order contains errors and therefore cannot be processed, it returns a failure notification that specifies exactly one error even if the order contained more than one. This is another "bug": an efficient FOC process would identify all errors at once. That our initial testing revealed interface problems is neither surprising nor particularly disconcerting: as I have explained, system implementation ordinarily does reveal system errors, which (hopefully) are then corrected. What is both surprising and disconcerting, though, is Ameritech's disregard of the ordinary de-bugging process -- by claiming that interfaces introduced on January 1 can be operationally ready on January 2.

Q: Has MCI actually attempted to order and provision resale service through Ameritech's OSS interfaces?

A: Yes. However, MCI's own experiences ordering resale services from Ameritech on a trial basis demonstrate that Ameritech's provisioning systems are plagued with problems. To date, MCI has engaged in three separate resale tests with Ameritech in Illinois in November and December 1996. The tests in Illinois apply to resale in Wisconsin; with limited variations not here relevant, Ameritech uses the same OSS standards and interfaces throughout its region, and operates through a single facility, located in Milwaukee, Wisconsin. As I will explain, the results of these three tests were extremely discouraging.

On Wednesday, November 27, 1996, MCI submitted a test order for three

residential lines in Illinois previously subscribed to Ameritech to be switched, or "migrated" over to MCI. Ameritech had assured MCI that the migrations would be completed within one business day. We therefore expected completion on Friday, November 29. Ameritech informed MCI that the lines had been successfully migrated on December 2. Three days later MCI was able to confirm that the lines had not been migrated -- that is, that Ameritech was still treating the customer as its own -- and immediately informed Ameritech. On December 6, Ameritech told MCI that the problem had been identified as training and systems errors by Ameritech personnel that caused the migration order to "error out" at the billing stage. Ameritech assured MCI that the errors had been corrected and that the line migrations had been completed. Again, this was not so. MCI discovered on December 9, and reported to Ameritech, that the lines still had not migrated.

Ameritech continued its troubleshooting in an effort to effect the migration. Ameritech's efforts were substantially impeded, however, by a substantial flaw in its error-identification processes. As Ameritech explained to MCI at the time, it runs a nightly process to identify system errors, but that process can kick out only one error per night. That is, its internal trouble-shootings systems -- like the order-error identification process in its FOC function -- are unable to continue processing after having identified a single error. As a result of this self-diagnostic infirmity, it took Ameritech nearly two weeks to find, and correct, all of the systems errors that were preventing MCI's line migration. Switching of the three residential lines to MCI was completed on December 19 -- more than three weeks after MCI had submitted its

resale order to Ameritech.

Even at this point, however, migration was not entirely successful. While basic residential service had migrated to MCI, that migration did not include all of the ordered vertical features. In particular, one line was supposed to be migrated with caller ID intact. That is, the customer has subscribed to caller ID on one test line as an Ameritech customer and the order had specified that caller ID should be provided on the same line after the customer switched to MCI. But the feature "fell off" somewhere during migration. An Ameritech maintenance representative later confirmed that the order called for Caller ID but that the line did not show that service.

Unfortunately, MCI's experience with "feature fall-off" was not limited to this single example. On December 20, we submitted an order for resale of three small business lines to be completed December 26. One line was to be migrated with all services, including call forwarding, intact. The call forwarding feature was successfully migrated, but the numbers to which calls were to be forwarded were lost. As a result, calls to the line were not actually being forwarded anywhere notwithstanding that the feature was shown as migrated and thus billed to the end-user. The order for migration of a second line directed that call forwarding should be dropped. (In other words, a customer that subscribed to call forwarding as an Ameritech subscriber did not want to continue using that service after switching to MCI.) The migration was completed with call forwarding intact. The third line migration was performed in all respects successfully. After migration, however,

MCI placed an order on January 23 to add two services that had not previously been on the line (call waiting and automatic call-back) and to cancel one service that had been (speed dial). Ameritech did not execute any of these instructions correctly: it failed to add call waiting, informed MCI (incorrectly) that automatic call-back was not resellable, and removed a service (call forwarding) that we had not asked to be removed. In short, this trial demonstrated a series of errors with Ameritech's OSS for provisioning resold services. Furthermore, the wide variety of mistakes encountered suggests that Ameritech's problems are not likely due to a single bug, making it likely that the errors will not be quickly rectified.

Lastly, MCI also encountered problems with our recent test order of two trunk lines. Our problems began, once again, with our inability to get timely and sufficient answers from Ameritech to our most basic ordering questions. First, Ameritech representatives repeatedly misinformed MCI representatives that DID trunks were the only types available for resale. It took two months to learn otherwise. Second, as I discussed earlier, it took an unreasonably long time for Ameritech representatives to provide answers regarding the vocabulary and syntax necessary to complete Ameritech's order forms. MCI finally was able to submit our order for two test trunks on December 17 -- weeks after we would have submitted an order had we received prompt and adequate answers to our basic ordering questions.

We received a FOC the next day which confirmed installation for December 19 and provided the phone number for each line. On the 19th, we received a second

FOC explaining that the first FOC contained incorrect phone numbers and setting installation for the 20th instead of the 19th. Nonetheless, the trunks were in fact installed later on the 19th. The installation order listed the trunk numbers as those indicated in the original FOC. After MCI representatives called Ameritech to investigate, we were given yet a third set of phone numbers for the two trunks. MCI has inquired of Ameritech to understand what went wrong in Ameritech's ordering and provisioning processes. To this date, however, MCI has received no explanation.

In light of MCI's limited -- though error-plagued -- experience with Ameritech service resale, Ameritech's contentions that its implementation tests all demonstrate that its OSS interfaces and systems for resale operate properly, and that all errors can be quickly resolved without affecting service are inexplicable. A service delay of several weeks is "service affecting" by any measure, as is "feature fall-off." It would be devastating to a CLEC to encounter such problems when transacting with real customers.

Moreover, these tests clearly have revealed "a design flaw" -- namely, the fact that Ameritech's trouble-shooting systems can apparently identify only a single error per review cycle. As far as I know, Ameritech still has not corrected this problem. Furthermore, these provisioning failures cannot be dismissed on the grounds that the orders were submitted manually rather than via automated interface because, as Ameritech will readily admit, there is no difference between resold lines processed on a manual basis and resold lines processed on an electronic basis once the initial order has been entered.

Ameritech has represented to MCI that the particular errors that confounded our three early resale trials have been corrected. MCI cannot confirm whether this is true.

More recently, MCI has identified additional problems with Ameritech's resale order systems ("ESO"). First, Ameritech does not currently support "Resale Suspend and Restore." This means that MCI cannot block a customer service for non payment. In addition we cannot provide seasonal or vacation service to our customers. Ameritech have advised MCI they will be filing a tariff for this service, however no dates or details are forthcoming. MCI first posed this concern to Ameritech on 1/24 and it was not until 2/26 that Ameritech advised MCI of the future tariff filing to address the problem. Moreover, Ameritech has not yet provided a manual process for the non payment issue.

Next, Ameritech's "Version 3.0" of its ESO has conflicting information in regard to purchase order number (PON) versioning capabilities. MCI was originally led to believe that Ameritech supported versioning. It was only through MCI testing efforts that we identified this was not true. Without "versioning" it is impossible for MCI to distinguish whether return EDI information from Ameritech is for the original order or for the supplement(s). Only after escalation of this issue by MCI did Ameritech move versioning from their 3.2 Release to the 3.0 Release. While this will eventually provide MCI with the needed PON identification ability Ameritech will not have this ready to test until 3/24, with an estimated production ready date of 3/31. Also troubling is the fact that these dates were not officially

given to MCI until 3/18, greatly complicating our own planning and test marketing.

Finally, MCI is currently unable to obtain the existing customer directory listing from Ameritech in real time format. This is critical information to ensure that our end user customer is correctly listed in both the directory and the 411 data base. It is impossible to be competitive if we must wait for the Customer Service Record with the listings to be received from Ameritech. On "migrate as specified" orders, MCI must indicate a change of listing and insert what the customer negotiated listing on the order. This order will then drop to a manual process at Ameritech who will remove all existing listings associated with the telephone number(s) and insert the listing as indicated by MCI. The potential for error with all of these steps is quite high and the consequence of any error is severe if not caught before an annual paper directory is published.

More troubling than any individual errors or implementation problems, Ameritech appears entirely to ignore the basic lesson of our experience. The simple lesson is this: errors happen unexpectedly. After all, all of these problems occurred despite the "extensive internal testing" Ameritech performed prior to putting its automated resale interfaces into operation in February of last year. This experience demonstrates clearly why there must be real operations in substantial numbers before it can be determined just how well -- or how poorly -- any particular OSS interfaces and downstream systems work. Ameritech's insistence that its internal testing procedures can provide adequate assurance of acceptably error-free operation must be rejected. Further, any contention by Ameritech that its test environment mirrors